

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Boston Edison Company
Cambridge Electric Company
Commonwealth Electric Company
d/b/a NStar Electric

)
)
)
)
)
)

M.D.T.E. 03-121

**THE ENERGY CONSORTIUM
AND FIVE NAMED MEMBERS'
MOTION TO EXTEND TIME FOR FILING PRE-FILED TESTIMONY**

The Energy Consortium and five members, Harvard University, Polaroid Corporation, Massachusetts Institute of Technology, USG Corporation, and Shaw's Supermarkets (collectively "TEC") hereby move the Department of Telecommunications and Energy ("the Department"), pursuant to 220 CMR 1.04(5) to extend the time for TEC to file pre-filed testimony for eight (8) business days from March 16, 2004 to March 26, 2004 or, in the alternative, extend the time for filing of pre-filed testimony to a date no later than seven days following TEC's receipt of complete responses from NStar to TEC's information requests. As grounds for this request TEC states as follows:

- 1) TEC request this extension in order to allow it time to review NStar's responses to its Requests for Information filed February 27, 2004 and March 5, 2004.

- 2) Although the hearing officer ordered all Parties to respond to information requests on a rolling basis, TEC has, as of the date of this motion, not received any response, or objection, to its timely filed requests for information from NStar.
- 3) Receipt and review of the requested information is necessary for TEC to provide the Department with clear and informed testimony.
- 4) TEC notes that a similar request has been filed by another intervenor referencing NStar's apparent inability to respond to information requests on a rolling basis.

For these reasons, TEC respectfully requests that it's Motion to Extend Time be allowed.

RESPECTFULLY SUBMITTED
On Behalf of TEC by its attorney,

Richard G. Mills, Esq
7 Tanager Street
Arlington, MA 02476
781-646-4635

Dated: March 12, 2004

CERTIFICATE OF SERVICE

I hereby certify, under the pains and penalties of perjury, that the foregoing

THE ENERGY CONSORTIUM AND FIVE NAMED MEMBERS' MOTION TO EXTEND TIME FOR FILING PRE-FILED TESTIMONY

was served on March 12, 2004, by deposit postage prepaid in First Class US Mail, upon:

Bruce Barnett, Esq.
Piper Rudnick
One International Place
21st Floor
Boston, MA 02110

Paul Gromer, Esq.
Peregrine Energy Group
151 Merrimac Street
Suite 660
Boston, MA 02114

Donald Bishop
Northeast Utilities Service Company
101 Federal Street
13th Floor
Boston, MA 02110

Heather Hunt, Esq.
United Technologies Corp.
242 Whippoorwill Lane
Stratford, CT 06614

Patricia Crowe, Esq.
KeySpan Energy delivery New England
52 Second Avenue
4th floor
Waltham, MA 02451

Adam Kahn, Esq.
Foley, Hoag LLP
155 Seaport Blvd.
Boston, MA 02210

Francis Cummings
Massachusetts Renewable Energy Trust
75 North Drive
Westborough, MA 01581

Seth Kaplan
Conservation Law Foundation
62 Summer Street
Boston, MA 02110

Garry Epler
Unitil Service Corp.
6 Liberty Lane West
Hampton, NH 03842

Stephen Klionsky, Esq.
Western Massachusetts Electric
Company
101 Federal Street
13th Floor
Boston, MA 02110

Roger Freeman, Esq.
Robert Granger, Esq.
Ferriter, Scobbo & Rodophele, PC
125 High Street
26th Floor
Boston, MA 02110

Diane Langley, Esq.
Division of Energy Resources
70 Franklin Street
7th Floor
Boston, MA 02110

Colleen McConnell, Esq.
Office of the Attorney General
200 Portland Street
4th Floor
Boston, MA 02114

Andrew Newman, Esq.
Rubin and Rudman
50 Rowes Wharf
Boston, MA 02110

Angela O'Connor
Associated Industries of Massachusetts
222 Berkley Street
13th Floor
Boston, MA 02117

Jerrold Oppenheim, Esq.
Low-Income affordability Network, et.
Al.
57 Middle Street
Gloucester, MA 01930

Amy Rabinowitz, Esq.
National Grid
25 Research Drive
Westborough, MA 01582

Susan Richter
Wyeth BioPharma
One Burt Road
Andover, MA 01810

Joseph Rogers, Esq.
Office of the Attorney General
200 Portland Street
4th Floor
Boston, MA 02114

David Rosenzweig, Esq.
Keegan, Werlin & Pabian, LLP
265 Franklin Street
6th Floor
Boston, MA 02110

Robert Ruddock, Esq.
Associated Industries of Massachusetts
222 Berkley Street
13th Floor
Boston, MA 02117

Ronald Schott
Wyeth Pharmaceuticals, Inc.
5 Giralda Farms
Madison, NJ 07940

Rudy Stegemoeller, Esq.
Plug Power, Inc.
P.O. Box 359
Poestenkill, NY 12140

Anne Sterman, Esq.
Foley, Hoag LLP
155 Seaport Blvd.
Boston, MA 02210

Michael Vhay, Esq.
Piper Rudnick
One International Place
21st Floor
Boston, MA 02110

Robert Werlin, Esq.
Keegan, Werlin & Pabian, LLP
265 Franklin Street
6th Floor
Boston, MA 02110

Signed, _____
Richard G. Mills